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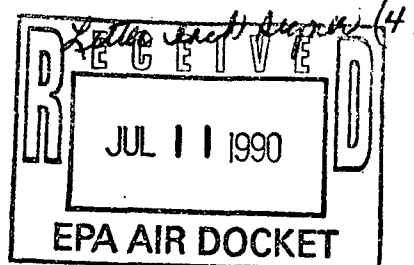
SUBCOMMITTEE ON HEALTH AND THE ENVIRONMENT

2415 RAYBURN HOUSE OFFICE BUILDING
WASHINGTON, DC 20515
PHONE (202) 225-4952

June 29, 1990

The Honorable William K. Reilly
Administrator
Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460

Dear Mr. Reilly,



We are writing to urge you to review with great care the pending petition by the Ethyl Corporation to add MMT, a manganese-containing organic compound, to gasoline as an octane booster. We are extremely concerned about the potential for serious health impacts from the introduction of MMT into gasoline.

Manganese is listed as an air toxic in both the House and Senate approved clean air act amendments that are now pending at conference. As I am sure you are aware, manganese is capable of serious neurotoxic effects. Studies have demonstrated that manganese damages the human brain, causing dementia and severe movement disorder (closely resembling Parkinson's disease), and may induce premature aging of the brain. It is our understanding that scientists have not yet fully determined at what exposure levels the adverse neurological effects of manganese begin.

America has not yet recovered from the painful experience caused by the use of another neurotoxic additive in gasoline -- lead. The legacy of the lead additive, contamination of our cities and highways, is widespread and intractable. This contamination is clearly linked to a continuing epidemic of childhood lead poisoning that has tragically afflicted the neurological development of millions of American children. Like lead, manganese is not only neurotoxic. It is an element, and thus does not degrade or lose its potency with the passage of time. As a result, the manganese released into the environment through use of MMT in a given year accumulates over time with all of the MMT released in the next year, and the next, and all subsequent years.

As a nation, we cannot afford to subject ourselves again to the tragic results of using a neurotoxic heavy metal in gasoline. Nor is use of such a dangerous compound necessary, given the wide availability of octane enhancers that are derivative from farm products, such as ETBE and ethanol, and are not hazardous air pollutants.

Moreover, a decision to allow the use of MMT without a clear demonstration that long term use of the substance is not associated with adverse health impacts would be in conflict with both the existing Clean Air Act, and with legislation now before the Clean Air Act conference committee.

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Section 207 of H.R. 3030, which overwhelmingly passed the House of Representatives last May 23, calls for EPA to establish regulations for motor vehicle fuels that reduce hazardous air pollutants such as manganese to "the greatest degree ... achievable through the application of technology which will be available." Moreover, section 212(d) includes a major new program for the reformulation of gasoline which requires that emissions of hazardous air pollutants from motor vehicles be reduced by 15 percent by 1994, 20 percent by 1997 and 25 percent by the year 2000. It would be entirely contrary to the clear intent of Congress for EPA to approve a new neurotoxic gasoline additive, just as amendments are about to be enacted calling for greater control of fuels and vehicles to reduce motor vehicle air toxics.

Moreover, approval of a new neurotoxic additive would be inconsistent with section 211 of the existing law, governing fuel additives, in the absence of definitive evidence demonstrating that long-term use of MMT will pose no threat to health or the environment.

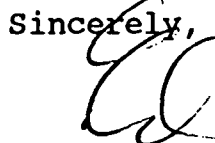
We ask that you provide a response before August 1, explaining in detail the Agency's position on this issue. Please include in your response a full evaluation of the health and environmental effects of adding manganese to fuels. We ask as well that the Health and Environment Subcommittee be kept informed of any changes in the EPA position on this issue, prior to any regulatory announcement.

Thank you for your attention to this important matter.

Sincerely,



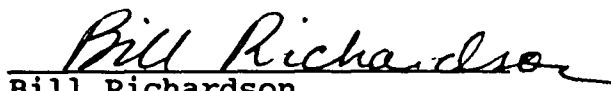
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